



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

AUG 11 2003

SDMS Document



128910

Mr. Williams J. Lee
de maximis, inc.
186 Center Street
Suite 290
Clinton, NJ 08809

Re: Chemsol, Inc. Superfund Site
Approval of Remedial Design Work Plan
Prepared by Brown and Caldwell for the Chemsol Inc.,
Site, dated June 2003.

Dear Mr. Lee:

The US Environmental Protection Agency (EPA) has reviewed the revised Remedial Design Work Plan (RDWP) submitted by the Chemsol Environmental Remediation Trust (Chemsol ERT). The purpose of the review was to determine if the revised document addressed EPA comments as stated in its May, 1 2003 letter. Based on its review, EPA is approving the RDWP, however, the following are EPA's comments/observations regarding the RDWP.

1.) Pumping of Extraction Well C-1.

The Chemsol ERT has conditionally agreed to pumping of well C-1 and has added a paragraph in Section 3.7 on page 3-19 of the revised RDWP "...groundwater extraction from C-1, within the capacity limits of the onsite treatment plant, will be included in the final pumping scenario so that the aquifer response to the combined pumping rates may be observed and evaluated." Also, the Chemsol ERT, in their response to comments letter (on page 2), state, "... if the containment remedy requires the full capacity of the treatment plant, pumping from C-1 would not be required."

Please note that for the record, EPA has not agreed that well C-1 will not be pumped if the containment remedy requires the full capacity of the treatment plant.

- 2.) Sampling of Existing Monitoring wells. Table 2-1 in Appendix A (SAMP) has not been revised as requested by EPA. The Chemsol ERT has only made references of its intent to sample the existing monitoring wells as indicated in the footnote of Table 2-1 and in the de maximis, inc. response to comments letter. Please revise Table 2-1.
- 3.) Long-term Water level Monitoring.
Section 3.3.3 has been revised to include the option for using data loggers at additional well locations suggested by EPA. Also, the Chemsol ERT in their response to comments letter (on page 3), states "Text has been added to provide the option for using data loggers at the additional locations suggested by EPA." In the first paragraph of Section 3.3.3, the text states, "long-term water level monitoring will be conducted to assess potential changes in groundwater flow directions associated with seasonal changes or off-site influences, south of the Chemsol property." The well locations tentatively chosen are C-3, C-4, TW-14 and TW-15. These four wells only monitor portions of the Upper Principal Aquifer. Thus the Upper Permeable Aquifer, the Lower Principal Aquifer and the Lower Bedrock Aquifer would not be monitored. It is still EPA's technical opinion that the locations suggested by EPA should be monitored with data loggers, without such monitoring, it may not be possible to properly assess "potential changes in groundwater flow directions associated with seasonal changes or off-site influences, south of the Chemsol property."
- 4.) Solubility Values.
The numerical value for solubility of tetrachloroethene has been changed from 2200 PPM to 150 PPM in Table 3-3. The numerical value for solubility of vinyl chloride has not been revised as requested by EPA. Please make the necessary revision.
- 5.) Static Water Level Measurements.
Section 3.6.1 has been revised to include the option for using data loggers at the additional well locations suggested by EPA.
- 6.) Antecedent Water Level Conditions.
The revised text indicates that antecedent data may also be collected from the additional wells as

suggested by EPA. However, it was further stated that "These additional locations are considered optional and not an integral part of the data collection efforts." Once again, it is EPA's technical opinion that the locations it has suggested should be monitored with data loggers, without such monitoring, the necessary data to properly assess the objectives stated in the Consent Decree SOW may not be collected.

7.) Groundwater Containment System.

Section 3.7.1 has been revised to optionally install data loggers in the additional monitoring wells suggested by EPA. However, the extraction wells EX-1P, EX-2UP, and EX-3L are not included in this list to be monitored by data loggers. Again, it EPA's technical opinion that placing data loggers in these extraction wells will better enable the Chemsol ERT to achieve the stated objectives of the PDVS.

Should you have any questions, please contact Nigel Robinson of my staff at (212) 637-4394.

Sincerely yours,



Carole Petersen, Chief
New Jersey Remediation Branch